

3573-54

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OCT 22 2013

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Marc J. Van Rafelghem, Ph.D  
The Proctor & Gamble Company  
5299 Spring Grove Avenue  
Cincinnati, OH 45217

Subject: Comet Disinfecting Bathroom Cleaner  
EPA Registration No.: 3573-54  
Application Date: 9/23/2013  
Receipt Date: 9/24/2013

Dear Dr. Van Rafelghem:

This letter acknowledges receipt of your notifications submitted under the provision of FIFRA section 3(c)9 and PR Notice 98-10.

**Proposed Notifications**

- Addition of an annotation to the claims "virucide/virucidal"
- Correction of antibiotic drug names, associated with *Acinetobacter baumannii* claim

**General Comments**

Based on a review of the submitted materials, your notification for the addition of an annotation and correction of drug names are acceptable and is made a part of the records on file.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at [campbell.jacqueline@epa.gov](mailto:campbell.jacqueline@epa.gov) or Jaclyn Pyne by telephone at (703) 347-0213 or by e-mail at [pyne.jaclyn@epa.gov](mailto:pyne.jaclyn@epa.gov). When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

Jacqueline Campbell  
Product Manager (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)



United States Environmental Protection Agency Washington, DC 20460

Registration Amendment Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 3573-54
2. EPA Product Manager Jacqueline Campbell
3. Proposed Classification None Restricted
4. Company/Product (Name) Comet Disinfecting Bathroom Cleaner
5. Name and Address of Applicant (Include ZIP Code) Marc J. Van Rafelghem, PhD
6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to:

Section - II

Amendment - Explain below. Resubmission in response to Agency letter dated. Notification - Explain below. Final printed labels in response to Agency letter dated. "Me Too" Application. Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Notification of corrections to Master Label per PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product.

Section - III

1. Material This Product Will Be Packaged In: Child-Resistant Packaging, Unit Packaging, Water Soluble Packaging, 2. Type of Container, 3. Location of Net Contents Information, 4. Size(s) Retail Container, 5. Location of Label Directions, 6. Manner in Which Label is Affixed to Product

Section - IV

1. Contact Person (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) Name: Marc J. Van Rafelghem, Ph.D., Title: Regulatory Manager, Telephone No.: 513-527-7375
Certification: I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete.
2. Signature: [Signature], 3. Title: Regulatory Manager, 5. Typed Name: Marc J. Van Rafelghem, Ph.D., 5. Date: September 23, 2013
6. Date Application Received (Stamped)



The Procter & Gamble Company  
Fabric & Home Care – Global Product Stewardship  
Fabric & Home Care Innovation Center  
5299 Spring Grove Avenue  
Cincinnati, OH 45217-1025  
[www.pg.com](http://www.pg.com)

September 23, 2013

Document Processing Desk (NOTIF)  
Antimicrobial Division (7504P)  
U. S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501  
Attn: Ms. Jacqueline Campbell (PM# 34)

**Subject: Comet Disinfecting Bathroom Cleaner (EPA Reg. No. 3573-54)  
Notification of Label Change per PR Notice 98-10**

Dear Ms. Campbell:

Per PR Notice 98-10, The Procter & Gamble Company is submitting the following notification to make the following two minor corrections to the March 22, 2013 stamped master label for Comet Disinfecting Bathroom Cleaner (EPA Reg. No. 3573-54).

- 1) The addition of an annotation to the claims "virucide/virucidal" found on pages 1 and 6 of the master label, and
- 2) The correction of some of the antibiotic drug names, associated with the multi-drug resistant *Acinetobacter baumannii* claim found on page 6 of the master label.

**ENCLOSURES**

In support of this notification, the following materials are enclosed:

- 1. Application for Pesticide Registration (EPA Form 8570-1) containing the required certification statement to accompany a notification per PR Notice 98-10
- 2. Two (2) copies of the revised Master Label, dated September 18, 2013, with changes incorporated
- 3. One (1) copy of the revised Master Label, with changes in redline marking

Thank you for your assistance in the processing of this Notification. It is the request of The Procter & Gamble Company that the Agency provide its decision electronically to [vanrafelghem.mj@pg.com](mailto:vanrafelghem.mj@pg.com) . If you have any questions concerning the enclosed materials, please contact me at (513) 627-7375 or [vanrafelghem.mj@pg.com](mailto:vanrafelghem.mj@pg.com) .

Sincerely,

Marc J. Van Rafelghem, PhD  
Regulatory Affairs Manager  
Global Product Stewardship  
The Procter & Gamble Company  
enclosures

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**FRONT LABEL**

COMET DISINFECTING BATHROOM CLEANER \ alternate brand name \ product name

ACTIVE INGREDIENTS: Citric acid.....6.0%  
INERT INGREDIENTS:.....\*94.0%  
TOTAL.....100.0%  
\*Cleaning Agents, Quality Control Agents, Perfume and Water.

KEEP OUT OF REACH OF CHILDREN  
CAUTION: MAY BE HARMFUL IF SWALLOWED. See back \ side panel for other precautions.

Net Weight Statement

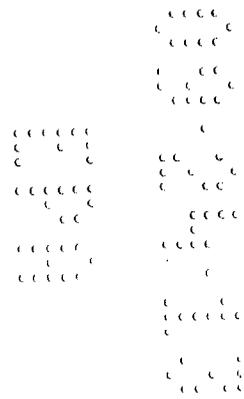
**[Optional]:**

Ready-to-Use  
Refill  
Disinfectant  
Hospital Use \ Medical Environment Disinfectant

For Automatic Dilution  
Concentrate  
5X Concentrate  
41 (*P&G identification number*)

Bactericide\Bactericidal  
Virucide†\Virucidal†  
Sanitizer  
Institutional  
Commercial  
P&G ProLine \ Procter & Gamble Professional [*or logo*]  
For Institutional Use \ For Industrial and Institutional Use  
NOT FOR RETAIL SALE

**NOTIFICATION**  
Data Reviewed: 10/22/2013  
Reviewed By: [Signature]



Note to Reviewer: Bold, italicized text is for reader clarity only. Bracketed [ ] text denotes optional text. Backslash \ denotes alternate text.

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**BACK\SIDE LABEL**

COMET DISINFECTING BATHROOM CLEANER \ alternate brand name \ product name

*Note to reviewer: The Directions for Use on the final product label will display one of the two sets of general cleaning directions listed below. The Direction for Use with either display the bullet points of general cleaning directions (up to and including the "For best results \ On tougher soils..." paragraph) OR the alternate general cleaning directions beginning with the "GENERAL CLEANING [DIRECTIONS]..." paragraph up to and including the "Rinse all [kitchen] surfaces..." paragraph. The final product label will then display the "TO [CLEAN AND] DISINFECT (hard, non-porous surfaces)..." directions on the ready-to-use containers, or the "TO [CLEAN AND] SANITIZE (hard, non-porous surfaces)..." directions on any container to complete the Directions for Use.*

**DIRECTIONS FOR [HOUSEHOLD] [INSTITUTIONAL] [COMMERCIAL] USE:** It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

- Lift flap and lock into arrow on top of sprayer. Picture of sprayer top. [*or for gallon size refill container only:* Refill [into] properly labeled spray bottle[s]. \ Refill [only] [properly labeled] [product name] spray bottle[s]. Picture of refill process.]
- Spray soiled surface until thoroughly covered [Picture of spraying action]
- Wipe with a damp cloth [or sponge]... for a shiny clean surface [*or* Spray soiled surfaces until thoroughly covered and wipe with a damp cloth [or sponge] [Picture of wiping action on bathroom surface]

For best results \ On tougher soils, allow product to remain on surface longer [*or* allow to soak]. [For daily cleaning, dilute 1 part product to [plus] 3 \ 4 parts water [(1) 8 oz [cup] per 32 oz spray bottle \ 6.4 oz per 32 oz spray bottle)]. Spray and wipe. On tougher soils, use product full strength.]

*OR, in place of the above usage instructions, use the following general cleaning directions up to and including the "Rinse all [kitchen]..." paragraph:*

**DIRECTIONS FOR [HOUSEHOLD] [INSTITUTIONAL] [COMMERCIAL] USE:** It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**GENERAL CLEANING [DIRECTIONS]:** Apply to hard, non-porous surfaces. Spray \ Pour directly onto surface [*or* damp sponge] [*or* cloth] [*or* paper towel] [*or* towel]. Rinse or wipe clean. For [On] tough stains [or soil], let soak \ stand. \ For tougher soils, allow to soak. [(For non-disinfecting light \ daily [duty] [soil] cleaning, dilute up to 1 part concentrate \ product to 9 \ 19 parts water).]

Rinse all [kitchen] surfaces that come in contact with food [such as countertops] with potable water before reuse. [Do not use on utensils, glasses or dishes.]

**TO [CLEAN AND] DISINFECT (hard, non-porous surfaces):** Clean surfaces prior to disinfecting heavily soiled areas. \ For highly \ heavily soiled areas, clean before disinfecting \ following disinfecting directions. Thoroughly wet hard, non-porous surfaces [with [disinfecting] solution] for 10 minutes, then rinse or wipe clean. \ Spray product on surface and let stand for 10 minutes [before wiping]. **[TOILET BOWLS [AND URINALS]:** Empty water from the toilet bowl [or urinal]. [Hold 6-8" from surface.] Spray [covering] exposed surfaces. Brush thoroughly [over surfaces including the rim to completely wet surfaces], let stand for 10 minutes, then flush.]

**TO [CLEAN AND] SANITIZE (hard, non-porous surfaces):** Clean surfaces prior to sanitizing heavily soiled areas. \ For heavily soiled areas, clean before sanitizing \ following sanitizing directions. Thoroughly wet hard, non-porous surfaces [with [sanitizing] solution] for 5 minutes, then rinse or wipe clean. \ Spray product on surface and let stand 5 minutes [before wiping]. **[TOILET BOWLS [AND URINALS]:** Empty water from the toilet bowl [or urinal]. [Hold 6-8" from surface.] Spray [covering] exposed surfaces. Brush thoroughly [over surfaces including the rim to completely wet surfaces], let stand for 5 minutes, then flush.] [For light \ daily [duty] [soil] cleaning & sanitizing, dilute \ mix 1 part concentrate \ product to \ with 4 parts water.]

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To Prepare [Disinfecting or Sanitizing] Solution using Dilution Center

**Automatic Dilution Container Instructions**

**ATTACHING THIS PRODUCT TO THE [P&G] [AUTOMATIC] DILUTION CENTER:** Remove the [white] shipping cap. [Picture of automatic dilution center process] Screw on [light] [green] dispensing cap from dilution center [product tube]. Push down while twisting.

**[PREPARING SANITIZING SOLUTION:** Dilute \ Mix 1 part [of this] product \ concentrate with 4 parts water using the [P&G] [AUTOMATIC] dilution center.]

**[PREPARING DISINFECTING SOLUTION [(UNDILUTED)]:** Set dilution center to by-pass; if dilution center does not dispense undiluted product, remove bottle from dilution center and remove bottle plug.]

*Note to Reviewer: The order of the Directions for Use might differ on the product label from what is listed above, but the content of the information will be the same.*

**KILLS HIV-1 (AIDS VIRUS) ON PRECLEANED ENVIRONMENTAL SURFACES\OBJECTS PREVIOUSLY SOILED WITH BLOOD\BODY FLUIDS,** in health care settings in which there is an expected likelihood of soiling of inanimate surfaces\objects with blood or body fluids, and in which the surfaces\objects likely to be soiled with blood or body fluids can be associated with the potential for transmission of human immunodeficiency virus Type 1(HIV-1) (associated with AIDS).

**SPECIAL INSTRUCTIONS FOR CLEANING AND DECONTAMINATION AGAINST HIV-1 ON SURFACES\OBJECTS SOILED WITH BLOOD\BODY FLUIDS.**

**PERSONAL PROTECTION:** When handling items soiled with blood or body fluids, use disposable latex gloves, gowns, masks and eye protection.

**CLEANING PROCEDURE:** Blood and other body fluids containing HIV must be thoroughly cleaned from surfaces and objects before application of this product.

**CONTACT TIME:** Thoroughly wet surfaces with disinfecting solution for 10 minutes, then rinse or wipe clean. Please consult the usage directions to determine the appropriate contact times for other organisms.

**DISPOSAL OF INFECTIOUS MATERIAL:** Blood, body fluids, cleaning materials and clothing must be autoclaved and disposed of according to local regulations for infectious waste disposal.

*Note to Reviewer: The first aid information provided below is compliant with PR 2001-1 and was submitted to the Agency for review on June 25, 2003. The "Do not mix" statement has been changed to provide more clarity.*

**PRECAUTIONARY STATEMENT: HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION:** Causes eye irritation. Avoid contact with eyes. May be harmful if swallowed. Do not mix with other cleaning products or chemicals as irritating fumes may be formed.

**FIRST AID: IF IN EYES,** hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

**IF SWALLOWED,** drink 1-2 glasses of water and call a doctor or poison control center (product contains an alcohol ethoxylate). Do not induce vomiting unless told to do so by a poison control center or doctor.

Have the product container or label with you when calling or going for treatment.

*Note to Reviewer: The boxed format as listed above will be used if label space permits; otherwise, an alternative format will be used to emphasize the text, such as bullet points, increased white space, increased font size or different colors.*

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**STORAGE/DISPOSAL:** Store in a cool place.

***(READY-TO-USE APPLICATION:)***

Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. \ (or)

(Nonrefillable container.) Do not reuse or refill this container (except as described in the directions for use). Wrap [container] and put in trash or offer for recycling if available. \ (or)

(Nonrefillable container.) Do not reuse or refill this container (except as described in the directions for use). Wrap [container] and put in trash or offer for reconditioning if appropriate. \ (or)

Always refill/reuse this container as described in the directions for use. Otherwise, wrap [container] and put in trash or offer for recycling if available. \ (or)

Only refill/reuse this container as described in the directions for use. Otherwise, wrap [container] and put in trash or offer for recycling if available. \ (or)

Refill/reuse this container only as described in directions for use. Otherwise, wrap [container] and put in trash or offer for recycling if available.

***(DILUTABLE APPLICATION – FIVE GALLONS OR LESS:)***

Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. \ (or)

(Nonrefillable container.) Do not reuse or refill this container (except as described in the directions for use). Wrap [container] and put in trash or offer for recycling if available. \ (or)

(Nonrefillable container.) Do not reuse or refill this container (except as described in the directions for use). Wrap [container] and put in trash or offer for reconditioning if appropriate. \ (or)

Always refill/reuse this container as described in the directions for use. Otherwise, wrap [container] and put in trash or offer for recycling if available. \ (or)

Only refill/reuse this container as described in the directions for use. Otherwise, wrap [container] and put in trash or offer for recycling if available. \ (or)

Refill/reuse this container only as described in directions for use. Otherwise, wrap [container] and put in trash or offer for recycling if available.

Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

[Refill:

- Refill [32 oz] sprayer size from [this convenient] container.
- Use only in [product name] spray bottle.
- Only refill [convenient] sprayer with [product name] [this product].
- [Only] refill sprayer with [ x oz.][only].
- Do not dilute].

Recycling logo Bottle made from 35% post-consumer recycled plastic.

[Contains] no phosphorus \ phosphate.

Will not harm septic tanks.

UPC code

Kosher Symbol

TM

®

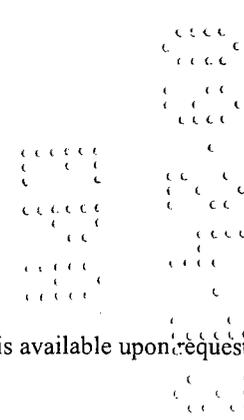
©

Phone symbol Questions? [Comments?] [MSDS?] [A Material Safety Data Sheet (MSDS) is available upon request from your supplier.]

[Call Toll-Free] X-XXX-XXX-XXXX

pgbrands.com [or www.pgproline.com]

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**Claims for Containers with Disinfecting Instructions (front, back or side label):**

<b>DISINFECTION</b>	
<p>This product [is a] hospital use \ medical environment disinfectant [that] kills \ cleans and kills \ eliminates \ destroys \ removes [a] broad \ wide range \ spectrum of bacteria [and] viruses† \ germs* (<i>list at least one bacterium and one virus from lists below</i>) \ and prevents the spread of <i>list of bacteria and/or options</i>:</p> <ul style="list-style-type: none"> <li>• Salmonella enterica (Salmonella) \ Salmonella enterica (ATCC 10708)</li> <li>• Staphylococcus aureus (Staph) \ Staphylococcus aureus (ATCC 6538)</li> <li>• Pseudomonas aeruginosa (Pseudomonas) \ Pseudomonas aeruginosa (ATCC 15422)</li> <li>• Proteus mirabilis (Proteus) \ Proteus mirabilis (ATCC 9240)</li> <li>• Escherichia coli \ E. coli \ Escherichia coli (ATCC 11229)</li> <li>• Escherichia coli O157:H7 \ E. coli O157:H7 \ Pathogenic E coli \ E. coli O157:H7 (ATCC 35150)</li> <li>• Shigella dysenteriae \ Shigella dysenteriae (ATCC 11835)</li> <li>• Staphylococcus aureus – CA MRSA \ Community Associated Methicillin Resistant Staphylococcus aureus- CA MRSA, PVL Positive \ Community Associated Methicillin Resistant Staphylococcus aureus \ Community Associated MRSA \ Community Associated Methicillin Resistant Staphylococcus aureus- CA MRSA, PVL Positive (NARSA # NRS 192)</li> <li>• Vancomycin Resistant Enterococcus faecalis – VRE \ Enterococcus faecalis (Vancomycin Resistant) \ Enterococcus faecalis (VRE/VR) \ Vancomycin Resistant Enterococcus faecalis – VRE (ATCC 51575)</li> <li>• [Multi-drug Resistant‡] Acinetobacter baumannii \ Acinetobacter baumannii (ATCC 19606)</li> <li>• Streptococcus pyogenes (Flesh Eating Strain BIRD M3)</li> <li>• Campylobacter jejuni (Campylobacter) \ Campylobacter jejuni (ATCC 29428)</li> <li>• Klebsiella pneumoniae (Klebsiella) \ Klebsiella pneumoniae (ATCC 4352)</li> <li>• Enterobacter aerogenes (Enterobacter) \ Enterobacter aerogenes (ATCC 13048)</li> <li>• Klebsiella pneumoniae – NDM-1 positive</li> <li>• Enterobacter cloacae NDM-1 positive</li> <li>• Escherichia coli NDM-1 positive</li> </ul> <p>‡Ampicillin, Ampicillin/Sulbactam, Aztreonam, Ceftazidime, Cefotaxime, Cefazolin, Piperacillin, Piperacillin/Tazobactam, Trimethoprim/Sulfamethoxazole and Ticarcillin/Clavulonic acid</p> <p><b>and list of viruses and/or options (†list at least one of the viruses below):</b></p> <ul style="list-style-type: none"> <li>• Avian Influenza A [virus] \ Avian Influenza A (H3N2) [virus]</li> <li>• Duck Hepatitis B virus</li> <li>• Human Hepatitis B virus (Duck Hepatitis B virus surrogate) \ Human Hepatitis B virus (Duck Hepatitis B virus) \ Hepatitis B virus (Duck Hepatitis B virus surrogate) \ Hepatitis B virus (Duck Hepatitis B virus) \ Human Hepatitis B virus \ Hepatitis B virus</li> <li>• Feline calicivirus</li> <li>• Norovirus \ Norovirus (Feline calicivirus as surrogate)</li> <li>• Bovine Viral Diarrhea virus</li> <li>• Human Hepatitis C virus (Bovine Viral Diarrhea virus surrogate) \ Human Hepatitis C Virus (Bovine Viral Diarrhea virus) \ Hepatitis C Virus (Bovine Viral Diarrhea virus surrogate) \ Hepatitis C Virus (Bovine Viral Diarrhea virus) \ Human Hepatitis C virus \ Hepatitis C virus</li> <li>• Rotavirus</li> <li>• Human Immunodeficiency Virus type I \ HIV-1</li> <li>• 2009-H1N1 Influenza A virus (Novel H1N1) \ 2009-H1N1 Influenza A virus</li> </ul>	<ul style="list-style-type: none"> <li>• Clean and disinfects</li> <li>• Disinfects as it cleans</li> <li>• One step cleaner and disinfectant</li> <li>• Disinfects [and deodorizes]</li> <li>• Restroom \ Bathroom disinfectant</li> <li>• Combines cleaning, disinfecting</li> <li>• Disinfecting cleaner</li> <li>• Disinfectant</li> <li>• Hospital Use \ Medical Environment Disinfectant <b>For use on commercial product only</b></li> <li>• Bactericide \ Bactericidal</li> <li>• Virucide† \ Virucidal†</li> <li>• Disinfects and deodorizes by killing bacteria [and controlling odors]</li> <li>• Cleans [and] [shines] [and] disinfects [and] [deodorizes] [washable] [restroom \ bathroom] [surfaces] [and] [fixtures]</li> <li>• One step cleaner &amp; disinfectant</li> <li>• Respiratory illnesses attributable to Pandemic 2009 H1N1 are caused by influenza A virus. This product (Product Name) is a broad-spectrum hard surface disinfectant that has been shown to be effective against (influenza A virus tested and listed on the label) and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu).</li> <li>• This product has demonstrated effectiveness against influenza A virus and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 influenza A virus.</li> <li>• This product has demonstrated effectiveness against (influenza A virus tested and listed on the label) and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu).</li> <li>• Kills Pandemic 2009 H1N1 influenza A virus (formerly called swine flu).</li> <li>• Kills Pandemic 2009 H1N1 influenza A virus.</li> </ul>

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**Additional claims (front, back or side label):**

<b>SANITIZING</b>	
<ul style="list-style-type: none"> <li>• Kills \ Eliminates \ Destroys \ Removes [and prevents cross contamination of] 99.9% of Staphylococcus aureus (Staph) and Enterobacter aerogenes (Enterobac) (<i>For products that require dilution only:</i> ) when 1 part product \ concentrate to 4 parts water (171 ppm hard water \ 10 gpg water hardness) [and 5% fetal bovine serum].</li> <li>• Kills \ Eliminates \ Destroys \ Removes [and prevents cross contamination of] 99.9% of bacteria (<i>For products that require dilution only:</i> ) when diluted 1 part product \ concentrate to 4 parts water (171 ppm hard water \ 10 gpg water hardness) [and 5% fetal bovine serum].</li> <li>• Cleans and kills \ eliminates \ destroys \ removes 99.9% of bacteria (<i>For products that require dilution only:</i> ) when diluted 1 part product \ concentrate to 4 parts water (171 ppm hard water \ 10 gpg water hardness) [and 5% fetal bovine serum].</li> </ul>	<ul style="list-style-type: none"> <li>• Sanitizer</li> <li>• Antibacterial Cleaner</li> <li>• Cleaner / sanitizer</li> <li>• Sanitizing cleaner</li> <li>• Cleans and sanitizes</li> <li>• Sanitizes non-food contact surfaces</li> <li>• Leaves surfaces [clean and] sanitized</li> </ul>

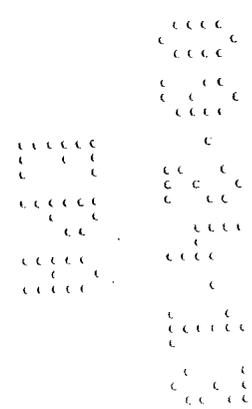
<b>CLEANING AND DEODORIZING CLAIMS</b>	
<ul style="list-style-type: none"> <li>• Cuts through \ Eliminates \ Removes \ Cleans \ Dissolves tough soap scum [and hard water stains] [from bathtubs] [and] [showers] [and] [shower stalls]</li> <li>• Dissolves \ Cleans \ Cuts through tough [stains] [soap scum] [and] [hard water stains]</li> <li>• Removes \ Eliminates \ Cleans tough [stains] [soap scum] [and] [hard water stains]</li> <li>• Cleans [and] [shines] [and] [deodorizes] [washable] [restroom \ bathroom] [surfaces] [and] [fixtures]</li> <li>• Cleans restroom \ bathroom surfaces, such as counters, sinks, tubs, toilet exteriors, showers, floors, etc.</li> <li>• Cleans without scrubbing</li> <li>• Restrooms – great all-around restroom \ bathroom cleaner</li> <li>• Makes employee tasks simple, cutting through soap scum [and] [hard water stains]</li> <li>• Designed to help improve cleaning productivity</li> <li>• Saves time – little to no scrubbing needed!</li> <li>• Minimizes training time</li> </ul>	<ul style="list-style-type: none"> <li>• Deodorizer</li> <li>• Deodorizes</li> <li>• Freshens</li> <li>• Freshens \ Deodorizes as you clean</li> <li>• Powerful restroom \ bathroom cleaner</li> <li>• Penetrates [and dissolves] tough soap scum and hard water stains [without scrubbing]</li> <li>• Penetrates tough restroom \ bathroom soils without scrubbing</li> <li>• Non-abrasive</li> <li>• Cleans most surfaces</li> <li>• Designed to improve cleaning productivity</li> <li>• No scrubbing</li> <li>• Minimizes training time</li> <li>• Fewer products – no need for separate deodorizer</li> <li>• Non-abrasive [formula] [won't scratch surfaces]</li> <li>• Rinses away easily</li> <li>• Eliminates \ Removes odors caused by bacteria</li> <li>• Scum buster formula</li> <li>• Heavy duty formula</li> <li>• A clean you can trust</li> <li>• Makes employee tasks \ job \ life simple \ easy</li> <li>• Powers away soap scum and hard water stains in one step</li> </ul>

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*Additional claims (front, back or side label):*

<b>NON-PESTICIDAL CLAIMS</b>	
<ul style="list-style-type: none"><li>• Institutional [size] [use]</li><li>• Commercial</li><li>• Not harmful to \ will not harm septic tanks</li><li>• Suitable for septic tank systems [and] [wastewater systems] [and] [treatment plants]</li><li>• Developed \ Formulated \ Designed for [institutional] [restroom \ bathroom] use</li><li>• This product \ Product name complies with consumer volatile organic compound (VOC) \ VOC laws</li><li>• [Contains] no bleach</li></ul>	<ul style="list-style-type: none"><li>• A clean you can trust</li><li>• Fresh \ pleasant scent</li></ul> <p><b><i>For closed chemical container only:</i></b></p> <ul style="list-style-type: none"><li>• Tamper proof bottle</li><li>• Bottle \ Sealed bottle \ Container \ Closed chemical system designed for employee safety</li><li>• Bottle \ Sealed bottle \ Container \ Closed chemical system designed to prevent spills and accidental concentrate \ product exposure</li></ul> <p><b><i>For gallon size refill container and closed chemical container:</i></b></p> <ul style="list-style-type: none"><li>• Concentrate</li></ul> <p><b><i>For gallon size refill container and closed chemical container that display dilution instructions to achieve sanitizing benefits:</i></b></p> <ul style="list-style-type: none"><li>• 5X Concentrate</li></ul> <p><b><i>For spray container only:</i></b></p> <ul style="list-style-type: none"><li>• For household use</li></ul>

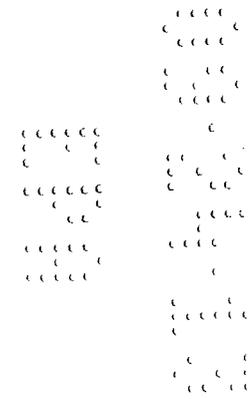


Note to Reviewer: Bold, italicized text is for reader clarity only. Bracketed [] text denotes optional text. Backslash \ denotes alternate text.

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**Additional claims (front, back or side label):**

<b>WHERE TO USE</b>	
<p>This product may be used on [washable] hard non-porous [non-food contact] [exterior] surfaces in <i>(list of and/or options)</i></p> <ul style="list-style-type: none"> <li>• Foodservice establishments</li> <li>• Restaurants</li> <li>• Bars</li> <li>• Cafeterias</li> <li>• [institutional] kitchen exteriors \ exterior surfaces</li> <li>• fast food operations</li> <li>• food storage areas</li> <li>• medical environments</li> <li>• hospitals</li> <li>• nursing homes</li> <li>• medical and dental offices and clinics</li> <li>• operation rooms</li> <li>• isolation wards</li> <li>• medical research centers</li> <li>• ambulance</li> <li>• schools</li> <li>• colleges</li> <li>• dormitories</li> <li>• classrooms</li> <li>• athletic facilities</li> <li>• gymnasiums</li> <li>• locker rooms</li> <li>• day care centers</li> <li>• nurseries</li> <li>• retail establishments</li> <li>• supermarkets</li> <li>• convenience stores</li> <li>• dressing rooms</li> <li>• laundries</li> <li>• laundromats</li> <li>• office buildings</li> <li>• funeral homes</li> </ul>	<ul style="list-style-type: none"> <li>• laboratories</li> <li>• recreational facilities</li> <li>• health clubs</li> <li>• household areas</li> <li>• kitchen exteriors \ exterior surfaces</li> <li>• bathrooms \ restrooms</li> <li>• basements</li> <li>• household garages</li> <li>• automotive garages</li> <li>• boats</li> <li>• ships</li> <li>• campers</li> <li>• RVs</li> <li>• Trailers</li> <li>• Mobile homes</li> <li>• Cars</li> <li>• Buses</li> <li>• Trains</li> <li>• Taxis</li> <li>• Airplanes</li> <li>• Transportation terminals</li> <li>• Veterinary clinics</li> <li>• Kennels</li> <li>• Breeding and grooming establishments</li> <li>• Pet \ animal quarters</li> <li>• Zoos</li> <li>• Pet shops</li> <li>• Churches</li> <li>• Manufacturing facilities</li> <li>• Military installations</li> <li>• Factories</li> <li>• Motels</li> <li>• hotels</li> </ul>

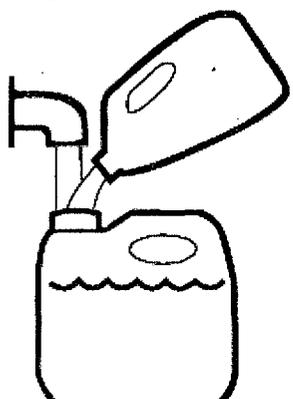
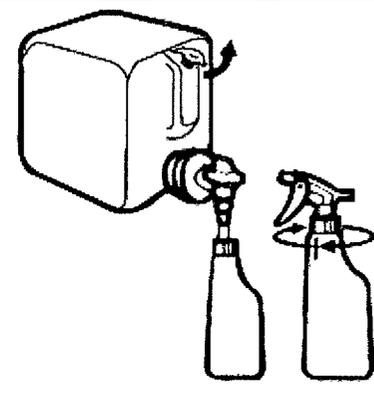


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<b>TASK AREAS</b>	
<p>Task areas:</p> <ul style="list-style-type: none"> <li>• Restroom \ bathroom surfaces</li> <li>• Glazed Porcelain</li> <li>• Fiberglass</li> <li>• Glazed Ceramic</li> <li>• Stainless steel</li> <li>• [Glazed] [Ceramic] Tile</li> <li>• Sealed Synthetic \ Cultured Marble</li> <li>• Formica</li> <li>• Chrome</li> </ul> <p>**Formica is a registered trademark of the Formica Corporation.</p>	<ul style="list-style-type: none"> <li>• Toilet exteriors</li> <li>• Urinal exteriors</li> <li>• Countertops</li> <li>• Sinks</li> <li>• Fixtures</li> <li>• Showers/Tubs</li> <li>• Shower walls and doors</li> <li>• Laminated surfaces[s]</li> <li>• Plastic laminate</li> <li>• Sealed granite</li> <li>• Baked Enamel</li> </ul> <p>For all other surfaces, test on a small area before use.</p> <p>Do not use on NATURAL MARBLE.</p>

**Picture Icons**

Restroom \ Bathroom surfaces (bathtub, shower, sink, toilet exterior)	Kitchen surfaces	Kitchen appliance exteriors	Floor surfaces
			

**Additional Directions for Use. Note to reviewer, sanitizing directions may or may not be numbered.**

To use Comet \ Comet Disinfecting-Sanitizing Bathroom Cleaner \ Alternate Brand Name \ Product Name as a disinfecting cleaner in the bathroom, use full strength and do not dilute.

To use Comet \ Comet Disinfecting-Sanitizing Bathroom Cleaner \ Alternate Brand Name \ Product Name as a sanitizing cleaner:

1. Fill 5-gallon dilution jug ½ full with water.
2. Add contents of 1 gallon \ Comet Disinfecting-Sanitizing Bathroom Cleaner \ Alternate Brand Name \ Product Name.
3. Top off jug with water
4. Gently shake to mix.
5. Dispense the solution directly into a spray bottle.

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